

## REMARKS

The Office Action, mailed October 31, 2007, has been received and its contents carefully noted. The then pending claims, claims 1-20, were rejected. By this Response, claims 1, 6, 7, and 9 have been amended. Claims 2-5, 8 and 10-20 have been canceled and claims 21-22 are added. Support may be found in the specification and the claims as originally filed. Payment is included for 3 independent claims in excess of 3 for which payment originally was made. No statutory new matter has been added. Therefore, reconsideration and entry of the claims, as amended, are respectfully requested.

### Objections

#### *Abstract*

The Examiner objected to the abstract of the disclosure because all reference numerals should be in parentheses.

Applicants respectfully urge that the Examiner should withdraw this objection in view of the amendments herein.

#### *Specification*

The Examiner objected to the Specification for a spelling error, use of reference letter "W" for three different wafers, and reference to "TR1 to TR5" on page 20, line 27, which are not in the Figures.

Applicants respectfully urge that the Examiner should withdraw this objection in view of the amendments herein.

#### *Claim 4*

The Examiner objected to claim 4 for repeating a "calibrating step" twice.

Applicants respectfully urge that the Examiner should withdraw this objection in view of the amendments herein. The objection is moot.

**Rejection under 35 U.S.C. 102(b)**

The Examiner rejected claims 1-5, 8-10, 13-14 and 17-18 under 35 U.S.C. 102(b) as being anticipated by Suzuki (US 20020014483). Specifically, the Examiner deemed that Suzuki discloses the claimed invention at col. 6, lines 55-60, col. 9, lines 12-29, and col. 10, lines 42-65. This rejection is traversed.

Applicants advise that the claims are amended so as to have substantially the scope as in their counterpart Japanese patent JP3802889B2. During the counterpart's prosecution, JP2002-24997A was considered. JP2002-24997A corresponds to Suzuki, US 20020024483A1.

As amended, the claims (process, and controller in the apparatus claims) recite particulars of Applicants' calibration, in particular they recite determining the correction value. This determination is supported at least by paragraphs [0069] to [0075] of the specification. It includes:

- determining a relationship between an amount of change ( $\Delta T_t$ ) in the temperature of one (e.g. 32) of the heaters and amounts of change (e.g.,  $\Delta T_{s1}, \dots, \Delta T_{s5}$ ) in the measured temperatures of the temperature sensors ( $S_1, \dots, S_5$ );
- determining a difference between an estimated temperature of one (e.g.,  $S_4$ ) of the temperature sensors located closest to the heater, which estimated temperature is estimated by using the thermal model, and an actual temperature of said one (e.g.  $S_4$ ) of the temperature sensors measured by the same; and
- calculating a correction value (e.g., Expression 7) based on the determined relationship and the determined difference. The correction value is applied to the temperature model such that the estimated temperature of said one heater (e.g. 32) estimated by the thermal model is corrected by using the correction value.

Applicants respectfully submit that Suzuki fails to teach or suggest such a method, or such a calculation means, for determining a correction value. Therefore, Applicants respectfully urge that the claims, as amended, are novel. The rejection under 35 U.S.C. 102(b) should be withdrawn.

**Rejection under 35 U.S.C. 103(a)**

The Examiner rejected claims 6-7, 11-12, 15-16 and 19-20 under 35 U.S.C. 103(a) as being unpatentable over Suzuki in view of Muka (US 6,193,506). Applicants respectfully submit that Muka does not alleviate the deficiencies of Suzuki. Specifically, Muka fails to teach or suggest Applicants steps of, or apparatus for, determining the correction value in the way that all the independent claims now describe. Thus, Muka alone, or in combination with Suzuki, does not suggest the claimed invention.

Therefore, Applicants also respectfully urge that the claims, as amended, are unobvious. For at least these reasons, the rejection under 35 U.S.C. 103(a) should be withdrawn.

**Request for Interview**

Applicants respectfully request either a telephonic or an in-person interview should there be any remaining issues.

### CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Therefore, it is respectfully requested that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

It is not believed that extensions of time are required, beyond those that may otherwise be provided for in accompanying documents. However, in the event that additional extensions of time are necessary to prevent abandonment of this application, then such extensions of time are hereby petitioned under 37 C.F.R. 1.136(a), and any fees required therefore are hereby authorized to be charged to **Deposit Account No. 02-4300, Attorney Docket No. 033082M295.**

Respectfully submitted,  
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